

City of La Verne Illicit Connections and Illicit Discharges (IC/ID) Elimination Program

I. INTRODUCTION

General Description

This Program addresses procedures to detect and remove illicit discharges and improper disposal into the storm drain system. Also, included in this program is a process to identify and eliminate illicit connections.

The general objective for this program is to improve the quality of storm water by effectively prohibiting non-storm water discharges and by reducing the discharge of pollutants to the extent practicable. To achieve this objective the City will implement the following program, which includes the following major components:

- Illicit Discharge Elimination
- Illicit Connection Elimination
- Public Reporting
- Reporting Hazardous Substances Entering the Storm Drain System

Each program component will be improved and refined, as necessary, based on annual assessments and evaluations.

II. ILLICIT DISCHARGE ELIMINATION

The goal of this component is to detect and eliminate illicit discharges from entering the storm drain system to reduce the discharge of pollutants from such discharges to the extent practicable. By accomplishing this goal, this will improve the quality of storm water runoff.

The primary objectives of this component are:

- Incidental spills or disposals (including sanitary sewer leaks or overflows reported by the public or other agencies or observed by City staff during the course of their normal daily activities will be contained, cleaned up and investigated.
- Prohibited non-storm water discharges to the storm drain system reported by the public or other agencies or observed by City staff during the course of their normal daily activities (such as surface runoff associated with wash down from an industrial site) will be eliminated through voluntary termination or enforcement action that will result in the immediate termination of the discharge.
- Suspected prohibited non-storm discharges in the storm drain system observed by City staff during the course of their normal daily activities, that may result from illicit connections whose origin is unknown, will be investigated to determine the nature and source of the discharge and eliminated through voluntary termination or enforcement action.

Nature and Types of Illicit Discharges

The Permit has established definitions of illicit discharge and illicit disposal, which the City has adopted. The definitions are as follows:

Illicit Discharge: any discharge to the storm drain system that is prohibited under local, state, or federal statutes, ordinances, codes or regulations. Illicit discharge includes all non-storm water discharges pursuant conditionally exempted by such permit.

Illicit Disposal: means any disposal, either intentional or unintentional, or material(s), substance(s), or waste(s) that has the potential to pollute storm water or urban runoff unless otherwise allowed by law.

Exempt and Conditionally Exempt Discharges

Exempt Discharges:

- Flows from riparian habitats or wetlands;
- Diverted stream flows;
- Springs;
- Rising ground waters;
- Uncontaminated groundwater infiltration

Conditionally Exempted Discharges:

- Reclaimed and potable landscape irrigation water;
- Water line flushing;
- Discharges from potable water sources;
- Foundation drains;
- Footing drains;
- Air conditioning condensate
- Reclaimed and potable irrigation water
- Reclaimed and potable lawn watering
- Water from crawl space pumps;
- Dechlorinated swimming pool discharges;
- Individual residential car washing; and
- Sidewalk washing;
- Discharges from flows from emergency fire fighting activities.

The context of illicit discharge and illicit disposal used in this program include several categories as follows:

- Incidental spills or disposal of wastes or non-stormwater. These may be intentional, unintentional or accidental and would typically enter the storm drain system directly through drain inlets, catch basins or manholes or be deposited in the public right-of-way such that wash-off would reach the storm drain system.

- Discharges of sanitary sewage due to overflow or leaks; usually incidental but may be continuous.
- Continuous or intermittent discharges of prohibited non-storm water other than through an illicit connection. These typically occur as surface runoff from outside the public right-of-way (e.g., wash-down area from an industrial site).
- Continuous or intermittent non-storm water discharges through an illicit connection.

Spill Investigation, Containment and Cleanup

Current procedures are in place to contain, clean up and investigate illicit disposals and illicit discharges. These include procedures for sewage spills and hazardous material discharges/spills. Departments follow their respective policies and procedures for their departmental response.

Prioritization for Investigation of Illicit Disposal/Discharge

If the investigation and elimination of all illicit disposal/discharge incidents cannot be completed within a timely manner, especially during a natural disaster, a process to determine in what order the incidents should be investigated can be used. If such a process is necessary, the following method will be implemented to prioritize problem areas of illicit disposals/discharges.

- List all illicit disposal incidents that have been reported but not yet investigated and place in one of the following categories, category 1 having the greatest priority:
 1. Hazardous, affecting public health and safety
 2. Hazardous, affecting the environment (receiving waters, air, etc...)
 3. Hazardous, affecting property
 4. Hazardous, other
 5. Non-hazardous, affecting public health and safety
 6. Non-hazardous, affecting the environment (receiving waters, air etc...)
 7. Non-hazardous, affecting property
 8. Remaining incidents

Education Program for Inspectors, Maintenance and Field Staff

As per the Municipal NPDES Permit, City employees will be trained in pollution prevention practices. This will include but not be limited to an overview of the NPDES program, potential sources of storm water pollution, potential impacts of illicit discharges on beneficial uses, emergency spill cleanup procedures, hotline numbers, awareness of environmentally sensitive alternative products, and good housekeeping practices.

Specific training on illicit discharges/disposals has been conducted for inspectors, maintenance, field staff and other appropriate employees who may encounter illicit discharges/disposals during their regular activities. In addition, employees will receive annual refresher training.

Enforcement Procedures

Enforcement procedures will be implemented when the source and nature of the discharge is known. An enforcement program component aids in the elimination of illicit disposal or discharges. Through

municipal, state and federal legal authority enforcement procedures currently in place will continue to be used as well as policies and procedures of the respective departments.

Record Keeping and Documentation

The individual department/division that responds or is directly involved will be responsible for the record keeping and documentation of the incident. The City NPDES coordinator will annually compile the Citywide report from data kept by the various departments.

The Following information will be recorded by each department for each incident:

- Date, Time, Location
- Description of substance/material
- Source of substance, if determined
- Reason for discharge
- Action taken
- Date incident was closed

Spill and Illicit Discharge Prevention

The city has developed and continues to develop several outreach materials to inform and educate the general public. Materials are available at City Hall and are also distributed to the public at special events. Appropriate industrial/commercial outreach materials that are developed by the County will be made available to city staff to hand out as needed while conducting their educational site visits.

III. ILLICIT CONNECTION ELIMINATION

The goal of this component is to detect and eliminate illicit connections to the maximum extent practicable. By achieving this goal, this will reduce pollutants from entering the storm drain system by way of illicit connections.

Nature and Types of Illicit Connections

Illicit Connection: means any human-made conveyance that is connected to the storm drain system without a permit, excluding roof drains that convey only storm water.

Connection Types

In general, there are four types of connections to the storm drain system. The connection types vary in the cost and ease of documenting an illicit connection. Accordingly, for connection types, priorities have been established for identifying illicit connections in a cost-effective manner.

1. Through-Curb Connection (TCC)

This connection is a pipe opening in the curb that allows a discharge to flow into the street gutter. As defined in the permit, the street gutter is part of the storm drain system. The City

has numerous through-curb connections. These types of connections are the easiest and least expensive to survey for illicit connections and discharges because they are above ground and can be easily observed by City staff.

2. Catch Basin Connection (CBC)

This type of connection is a pipe piercing through a catch basin wall that allows a discharge to flow directly into the catch basin. City staff can observe the inside of the catch basins during regular maintenance activities for illicit connections that convey illicit discharges.

3. Open Channel Connection (OCC)

This type of connection is a pipe penetrating a wall of an open channel that allows a discharge to flow directly into the drainage channel. Open channels are considered to be dirt V-ditches, concrete rectangular or trapezoidal channels. The City does not own or maintain any open channels but our staff does report any illegal connections or discharges that they observe during their regular daily activities.

4. Pipe-to-Pipe Connection (PCC)

This type of connection is an underground pipe directly connected to the City's storm drainpipe within the City street public right of way. This type of connection is the least common type of illicit connection to be investigated because of the great expense.

Program Priorities

Priorities for the overall illicit connection program will be made based on practical identification in relation to time and monetary costs to the City.

Illicit Connection Detection and Investigation

The strategy to detect and investigate illicit storm drain connections is summarized below.

A connection to the storm drain system, that is suspected or observed to be the source of an illicit discharge, will be investigated to determine the source and nature of the discharge. The connection may be discovered while investigating a suspected illicit discharge, or detected by field staff during the course of their normal daily activities.

The Permittee shall eliminate all illicit connections the Permittee becomes aware of through inspectors or public reporting within 6 months after the Permittee gains knowledge of the connection.

The Permittee shall inspect at a minimum:

- Those portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater; for illicit connections

- Areas of the MS4 designated as high priority based on priorities identified in the storm water management plan
- Storm sewers to identify the presence of conditions that may suggest the presence of illicit connections and, where information is developed that suggests such connections exist, investigate and take necessary actions to eliminate the connection.

Even though La Verne does not own or maintain any open channels, City staff as a courtesy will inspect channels and report illicit connections to County officials.

Once an illicit discharge has occurred and an illicit connection is suspected, one of the following actions may occur:

- The connection will be terminated through voluntary action
- The connection will be terminated through aggressive enforcement proceedings
- If the discharge is determined to consist only of exempted non-storm water, the connection will be allowed to remain and will no longer be considered an illicit connection
- The discharge will be permitted through a separate NPDES permit

If the investigation and elimination of multiple suspected illicit connections cannot be investigated and completed in a timely manner, the City will prioritize potential problem areas for detection and investigate using the methodology defined earlier in this program.

If the suspected connection is active and it is suspected that the substance is hazardous, 911 will be called to begin the proper response.

If the substance is non-hazardous, Departmental investigation procedures will be followed.

The City contracts with Los Angeles County to clean all Catch Basins. Additionally, the County owns and operates all open channel systems within the City of La Verne.

Enforcement Procedures

Enforcement procedures will be implemented when the source and nature of the discharge is known. An enforcement program component aids in the elimination of illicit disposal or discharges. Through municipal, state and federal legal authority enforcement procedures currently in place will continue to be used as well as policies and procedures of the respective departments.

Record Keeping and Documentation

The individual department/division that responds or is directly involved will be responsible for the record keeping and documentation of the incident. The City NPDES coordinator will annually compile the Citywide report from data kept by the various departments.

Location of incidents must be transmitted to the Principal Permittee.

At a minimum, the following illicit connection information must be recorded and reported annually:

- Number of illegal connections identified in the past year;
- Number of illegal connections eliminated in the past year; and
- Number and type of enforcement actions, applicable to storm water enforcement, taken in the past year.

IV. PUBLIC REPORTING

The goal of the public reporting program is to promote, publicize, and facilitate public reporting of illicit discharges and illicit disposal incidents.

The baseline objective of the program is:

- A program will be implemented to receive incoming calls from the public regarding potential illicit discharges and illicit disposal practices, communicate and coordinate a response, follow up with the complaint, and maintain documentation of process and or procedures.

Receiving Incoming Calls

Reporting can occur from a number of different sources, including:

- 1-888-CLEAN LA. This is a hotline provided and maintained by L.A. County Department of Public Works. Calls received at this location are then forwarded to the appropriate municipality.
- Residents can contact the City of La Verne's Public Works Department at (909) 596-8741 during regular business hours.
- During non-business hours residents can contact the Police Department at (909) 596-1913 and they will either respond or contact the appropriate City employee to respond.
- Residents can report IC/ID's in person at City Hall.
- Residents have the option of utilizing our e-mail correspondence provided on the City Web-site
- Residents may also provide letters reporting illegal activity or complaints.

The contact information, such as phone numbers, will be updated with the County and all necessary parties in the event a change occurs.

The procedures to receive incoming reports of illicit discharge/disposal incidents include:

When an incident is reported, the call is routed to the appropriate department within the City for response. Each department then follows their associated policies and procedures. If there is an immediate threat to receiving waters the Fire Department will be notified at once through the 911 system.

Communications and Coordination

The City will continue with its current policies and procedures to coordinate activities between permittees to promptly investigate reports of illicit discharge/connection.

Follow-up With Complainant

The suitable City official, at their discretion, will determine if follow-up with the complainant, of actions taken, is appropriate.

Record Keeping and Documentation

Report forms will be submitted annually to the Los Angeles Regional Water Quality Control Board. These report forms are due annually and are submitted to the County of Los Angeles in August for a multiparty report. This is done to be in compliance with the Municipal Permit.

The City NPDES coordinator will compile the final document with information provided by the City departments.

The Permittee shall maintain a file of illicit discharge connections, which includes type of connection, location, evidence of illicit discharge, date of initial inspection, enforcement action taken, date of follow-up inspection, and date of removal.

There must also be a map of all illicit discharges on file.

V. REPORTING HAZARDOUS SUBSTANCES ENTERING THE STORM DRAIN SYSTEM

The goal of this program is to facilitate appropriate reporting of hazardous substances entering the storm drain system as a result of an illicit discharge.

The baseline objective of the program is:

- Report and document reportable quantities of hazardous substances entering the storm drain system.

Definitions of Hazardous Substances and Reportable Quantities

The permit defines a hazardous substance as a material defined under 40 Code of Federal Regulations (CFR) § 302. These are categorized as either “listed” or “unlisted” hazardous substances. Listed Hazardous substances are certain items of solid waste that exhibit characteristics identified in 40 CFR § 261.2 through 261.24. Examples of hazardous substances include any substance or chemical product for which one or more of the following applies:

- A material safety data sheet (MSDS) is required
- The substance is listed as radioactive by the Nuclear Regulatory Commission
- The substance is listed as hazardous by the U.S. Department of Transportation

- The material is listed in Labor Code S 6382(b)

The above four categories are described in the California Health and Safety Code, Division 20, Chapter 6.95, Hazardous Materials Release Response Plans and Inventory.

The Permit defines a reportable quantity of hazardous substance as the quantity set forth in 40 CFR S 302. For listed hazardous substances, this amount is the quantity listed in the column “Final RQ” on Table 302.4. For unlisted hazardous substances, this amount is generally 100 lbs.

Notification Procedures

Procedures to report incidents of “reportable quantity” of hazardous substances entering the storm drain system will continue to be implemented. These procedures include:

- When spill/illicit discharge/disposal materials are suspected to be hazardous, notify the appropriate Administering Agency.
- The Administering Agency will conduct a material investigation.
- If the material is hazardous, the Administering Agency will notify local, state and federal agencies and private contractors as necessary.
- If the material equals or exceeds the reportable quantity in a 24-hour period, the Administering Agency (or designated individual/department) will notify the California Office of Emergency Services (OES) and the National Response Center.

Appropriate staffs in various departments are trained in procedures for handling releases of hazardous substances.

Record Keeping and Documentation

Data will be submitted annually to the Los Angeles Regional Water Quality Control Board. This data is due annually and is submitted to the County of Los Angeles in August for a multiparty report. This is done to be in compliance with the Municipal Permit.

The City NPDES coordinator will compile the final document with information provided by the City departments.

The City shall maintain a file on illicit discharge/connections, which includes type of connection, location, evidence of illicit discharge, date of initial inspection, enforcement action taken, date of follow-up inspection, and date of removal.

Other reporting requirements for hazardous substances, unrelated to storm water quality, are covered in a number of federal and state regulations and are part of Departmental policies and procedures.